

**To:** PRCWater@aol.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Dave Kluesner/OU=R2/O=USEPA/C=US  
**Sent:** Mon 12/6/2010 5:13:18 PM  
**Subject:** In preparation for our desk review tomorrow (Dec. 7) at 11:00 AM at your office

#### Review Scope

- § Review the workplan under the signed assistance agreement, the recipient's progress reports and any products produced under the agreement to date
- § Review the Federal role under the agreement (including the collaborative activities, schedules, comments and approvals for which the Project Officer had the responsibility)
- § Identify the issues that require resolution during the review
- § Assess whether the recipient's progress is commensurate with payments made by EPA
- § Assess whether the grantee met any or all the programmatic reporting requirements
- § Review the applicability of Davis-Bacon requirements to this award
- § Review the applicability of American Recovery and Reinvestment Act (ARRA) "Buy America" requirements to this award

#### AFTER THE Review, EPA:

- § Files a report which:
- § Summarizes Project Officer observations and conclusions in each of the core areas
- § Explains how the issues were resolved during the review
- § Discusses how and when outstanding issues will be resolved
- § Includes milestones and next steps

1. Financial	1. The PO should determine if...	YES	NO
	<input type="checkbox"/> <input type="checkbox"/>		

Project Officers are responsible for:

§ Analyzing the budget information in the reports by reviewing the payment history (using recipient progress reports, Financial Status Reports, or IFMS reports) and comparing actual amounts spent against the planned budget in the workplan.

§ Providing rebudget approval to the Grants Specialist on the recipient's request to rebudget grant funds or on actions which require prior approval from EPA. ...the payment history is consistent with the progress to date.

...additional funds are required to meet the objectives.

☐  
☐

2. Technical	The PO should determine if...	YES	NO
	<input type="checkbox"/> <input type="checkbox"/>		
	<input type="checkbox"/> <input type="checkbox"/>		

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Project officers are responsible for:

- § Monitoring all activities and the recipient's progress on the project.
- § Providing comments to the recipient on the progress reports and other work products.
- § Apprising program staff who are responsible for parts of the project/program on issues which need resolution.
- § Recommending actions that require the attention of the Grants Management Office, the Office of General (or Regional) Counsel, and the Quality Assurance/Quality Control contact. ...the work under the agreement is on schedule.

...the work being performed is within the scope of the workplan.

...the staff and facilities are appropriate to handle the work under the agreement.

...the products/progress reports are being submitted on time and are acceptable.

...any changes were made to the key personnel.

Explain:

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☐

3. Agreement Specific As Appropriate, the PO should determine if...

YES NO

PROGRAM REGULATIONS/TERMS and CONDITIONS

...the recipient has complied with the agreement's relevant programmatic regulations and/or programmatic terms and conditions.

☐ ☐

N/A ☐  
YES NO  
☐ ☐

EQUIPMENT

...the recipient purchased equipment as planned in the agreement.

...the equipment has been used as planned in the agreement.

☐ ☐

N/A ☐  
YES NO

PROPERTY

...the recipient purchased and used real property (e.g., land, buildings) as prescribed in the agreement

☐ ☐

As Appropriate, the PO should determine if...  
N/A ☐  
YES NO

TRAVEL

...authorized travel has been carried out.

☐ ☐

As Appropriate, the PO should determine if...  
N/A ☐  
YES NO

CONFERENCES

...the conference complied with the Best Practices Guide for Conferences. ☐ ☐

As Appropriate, the PO should determine if...

N/A ☐

YES NO

☐ ☐

☐ ☐

☐ ☐

#### SUBAGREEMENTS

...subagreement(s) is(are) consistent with the approved workplan.

...the recipient reprogrammed funds to contracting.

...the subcontract's statement of work is consistent with the scope of the assistance agreement.

...subagreement costs are eligible and allocable. ☐ ☐

As Appropriate, the PO should determine if...

YES NO

#### PROGRAM INCOME

...the project generated program income. ☐ ☐

N/A ☐

YES NO

#### HUMAN SUBJECTS

...the recipient has followed the regulations under 40 CFR Part 26. ☐ ☐

N/A ☐

YES NO

☐ ☐

☐ ☐

#### QUALITY ASSURANCE/QUALITY CONTROL

...an approved Quality Assurance Management and/or Quality Assurance Project Plan (QMP?QAPP) is in place.

...all personnel responsible for implementing the QMP/QAPP are familiar with its requirements.

...there is an audit tool and schedule to ensure that the QMP/QAPP requirements are met.

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As Appropriate, the PO should determine if...

N/A ☐

YES NO

#### EPA-FURNISHED IN-KIND ASSISTANCE

...assistance was satisfactory for use in the assistance agreement. ☐ ☐

As Appropriate, the PO should determine if...

N/A	<input type="checkbox"/>
YES	NO
<input type="checkbox"/>	<input type="checkbox"/>

#### RECIPIENT-FURNISHED/THIRD-PARTY IN-KIND CONTRIBUTIONS

...met the requirements under 40 CFR 30.23 or 40 CFR 31.24 (as appropriate).

...any adjustments were made to the cost share.

☐ ☐

As Appropriate, the PO should determine if ... YES NO

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Project Officers are Responsible for:

§ Reviewing progress reports and other work products to assure that the recipient is complying with the applicable regulations and the programmatic terms and conditions in the agreement.

3. Agreement Specific (cont.)

§ Notifying the GMO if the recipient is not complying with the terms and conditions of the agreement.

§ Providing technical assistance to recipients when requested or required by the programmatic terms and conditions of the award.

§ Assisting the recipient, where appropriate, with the development of a plan to conduct subsequent portions of the project.

§ Assessing the recipient's progress in achieving the outputs and outcomes set forth in the assistance agreement workplan.

Although it is not required, Project Officers should:

§ Share relevant information from the November 1998 Best Practices Guide for Conferences and the Office of General Counsel's Printing Guidance (June 14, 2000) with the recipient.

§ Work with the recipient to ensure that the work under a subagreement (e.g., contracts, subgrants, memoranda of understanding, and, if applicable, intergovernmental agreements under the assistance agreement) does not go beyond the scope of the assistance agreement.

Notes:

§ Select those areas which apply to your specific agreement: Equipment, Property, Travel, Conferences, Program Income, Subagreements, In-kind Services, Quality Assurance/Quality Control, Human/Animal Subjects.

3. Agreement Specific (cont.)

§ Project Officers must work with the recipient to resolve program income-related issues on agreements that generate program income. Is the recipient making progress in achieving outputs & outcomes set forth in the assistance agreement workplan?

Are the target dates and benchmarks being set?

If the recipient is experiencing significant problems meeting agreed upon outcomes and outputs, has the recipient been required to develop and implement a corrective action plan? ☐ ☐

Davis-Bacon and Buy America Compliance  
Is this awards made with ARRA funds? Yes

No

For any agreements, sub-agreements or loans that involve federally funded construction, alteration or repair contracts over \$2,000, where Davis-Bacon applies; did the recipient ensure that the contract or agreement contained the required clauses for complying with Davis-Bacon Act (DBA) wage rates, reporting requirements and included a wage rate determination?

If yes, enclose an electronic copy or hardcopy of the specific contract clause(s), including the wage determination with the report. Yes

No

N/A

For DBA-applicable contracts, did the recipient, their sub-recipients or borrowers as appropriate, depending upon the nature of the program, receive and review certified weekly payroll records per Department of Labor form WH-347?

If yes, enclose at least one electronic or hard copy example of page one and the signature page of a completed WH-347 with the report (redact all names, Social Security Numbers, addresses and other personal or Privacy Protected Information). Yes

No

N/A

For DBA-applicable contracts, did the recipient conduct labor interviews per DOL form SF-1445 (or equivalent) and/or require sub-recipients to do so when applicable?

If yes, enclose at least one electronic or hard copy example with the report (redact all names, Social Security Numbers, addresses and other personal or Privacy Protected Information). Yes

No

Planned for

N/A

For any agreements, sub-agreements or loans using American Recovery and Reinvestment Act (ARRA) funds to construct, alter, maintain or repair public buildings or public works; did the recipient ensure that the project contract or agreement required the acquisition of iron, steel and manufactured goods produced in the United States to comply with the "Buy American" provision of the Act? Yes

No

N/A

3. Agreement Specific  
(cont.)

- The PO should work with the Regional or National Davis-Bacon Coordinator to address any recipient Davis Bacon compliance issues.
- Davis-Bacon requirements may apply to non-ARRA awards.
- The Buy America provision here applies only to ARRA-funded awards. For any infrastructure, ARRA awards to State or local governments, were the necessary certifications provided under Section 1511 in accordance with program guidance and posted on a website linked to Recovery.gov? Yes  
No  
N/A

PROJECT OFFICER'S OBSERVATIONS and CONCLUSIONS  
AREAS REQUIRING PROJECT OFFICER ASSISTANCE  
AREAS REQUIRING SENIOR MANAGEMENT OR GRGANTS OFFICE ASSISTANCE  
SIGNATURE OF EVALUATOR  
DATE  
AGREEMENT NUMBER

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